

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil No.
)	
Thirteen Thousand Seven Hundred Ninety-Four)	
Dollars (\$13,794.00) in U.S. Currency,)	JURY TRIAL REQUESTED
more or less, seized from Joseph Taylor,)	
)	
Defendant <i>in rem</i>.)	
)	

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

Plaintiff, United States of America, brings this complaint in accordance with Supplemental Rule G(2) of the Supplemental Rules for Certain Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges:

NATURE OF THE ACTION

This is an action to forfeit and condemn to the use and benefit of the United States of America: Thirteen Thousand Seven Hundred Ninety-Four Dollars (\$13,794.00) in U.S. Currency, more or less, seized from Joseph Taylor for violations of 21 U.S.C. § 881(a)(6).

JURISDICTION AND VENUE

The United States brings this action *in rem* to forfeit and condemn the defendant property pursuant to 21 U.S.C. § 881. The Court has jurisdiction over this action under 21 U.S.C. §§ 1345 & 1355.

The Court has *in rem* jurisdiction over the property under 28 U.S.C. § 1355(b).

THE DEFENDANT *IN REM*

The defendant *in rem* is Thirteen Thousand Seven Hundred Ninety-Four Dollars (\$13,794.00) in U.S. Currency, more or less, seized from Joseph Taylor. The defendant *in rem* is in the custody of the United States Marshals Service.

FACTS

1. In November 2023, A Manchester Police Department (MPD) cooperating individual (CI) identified a person selling crack cocaine in Manchester. The CI said it bought crack from “CJ,” a skinny light-skinned black male, with a curly buzz cut. It said that when it wanted to buy drugs, it called CJ, who would come to the CI’s location. The drug deal would happen in CJ’s car, a silver Acura sedan with tinted windows. The CI said that it had been to CJ’s residence on the first floor of 111 Jewett Street. The MPD officers identified CJ as Joseph Charles Taylor (Taylor). DMV records confirmed that Taylor owned a silver 2015 Acura ILX.

2. Between November 9, 2023 and January 25, 2024, the Manchester PD officers used the CI to conduct three controlled buys of lab-confirmed crack cocaine from Taylor, once from his vehicle and twice from his residence.

3. On February 5, 2024, MPD officers arrested Taylor on a state warrant and seized \$794.00 (5 \$100 bills, 2 \$50 bills, 9 \$20 bills, 1 \$10 bill and 4 \$1 bills) from him. MPD officers also searched his residence using a state search warrant. During that search, officers seized four firearms, ammunition, and loaded magazines from a dresser in Taylor’s bedroom. The top drawer of his nightstand contained a bundled stack of \$13,000 (55 \$100 bills, 44 \$50 bills, and 265 \$20 bills). The total amount seized from Taylor’s person and nightstand is \$13,794.00, the defendant *in rem*. Officers also found a scale, four boxes of baggies, and a machine gun conversion device in the kitchen.



4. Officers used a money counter to verify the count and log the serial numbers for the \$13,000. Fifteen of the \$20 bills had been used in the controlled buys from Taylor. One of the firearms seized from Taylor had been reported stolen on April 17, 2023.

5. Taylor's criminal history includes a 2009 felony conviction for carrying a loaded firearm without a license; a 2016 felony conviction for felon in possession of a firearm; and a 2021 felony conviction for felon in possession of a firearm.

6. On March 25, 2024, Taylor pleaded guilty to an information charging him with distribution of a controlled substance (crack cocaine), possession of a firearm by a prohibited person and possessing an unregistered firearm. Sentencing is scheduled for July 22, 2014. Plea Agreement, ECF No. 2, *United States v. Joseph Taylor*, 1:24-cr-00032-PB-AJ (U.S.D.C., D.N.H.).

FIRST CLAIM FOR FORFEITURE

7. The allegations contained in paragraphs 1 through 6 of this Verified Complaint for Forfeiture *in Rem* are incorporated by reference.

8. Title 21, United States Code, Section 881(a)(6) subjects to forfeiture "all moneys ... or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or ... all proceeds traceable to such an exchange and all moneys ... used or intended to be used to facilitate any violation of" the Controlled Substances Act.

9. The defendant *in rem* \$13,794.00 in U.S. Currency, more or less, seized from Joseph Taylor, was furnished or intended to be furnished in exchange for a controlled substance, in violation of the Controlled Substances Act, 21 U.S.C. § 801, et seq., or represents proceeds traceable to such exchanges, or money used or intended to be used to facilitate violations of the Act, and is therefore liable to condemnation and forfeiture to the United States for its use, in accordance with 21 U.S.C. § 881(a)(6).

PRAYERS FOR RELIEF

Therefore, the United States requests that:

- (a) the Clerk of Court issue a Warrant of Arrest *in Rem* in the form submitted with this Verified Complaint to the United States Marshal for the District of New Hampshire commanding him to arrest the defendant *in rem*;
- (b) this matter be scheduled for a jury trial;
- (c) judgment of forfeiture be decreed against the defendant *in rem*;
- (d) the defendant *in rem* be disposed of according to law; and,
- (e) this Court grant the United States of America its costs and whatever other relief to which it may be entitled.

Respectfully submitted,

JANE E. YOUNG
United States Attorney

Dated: July 1, 2024

By: /s/ Robert J. Rabuck
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VERIFICATION

I, Patrick A. Dawley, being duly sworn, depose and say that I am a Special Agent with the Bureau of Alcohol, Drugs, Firearms and Explosives, and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *in Rem* and know the contents therein, and that the same is true to the best of my knowledge, information and belief.

The sources of my information and the grounds of my belief are official records and files of the United States and the State of New Hampshire, and information obtained by me and other law enforcement officers during an investigation of alleged violation of the controlled substance laws of the United States.

/s/Patrick A. Dawley
Patrick A. Dawley

STATE OF NEW HAMPSHIRE
COUNTY OF MERRIMACK

Subscribed and sworn to before me on July 1, 2024.

/s/ Francine D. Conrad
Notary Public

My commission expires: April 10, 2029.